

UNITED STATES DISTRICT COURT

for the

_____ District of _____

United States of America

v.

Case No.

)
)
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)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of _____ in the county of _____ in the

_____ District of _____, the defendant(s) violated:

Code Section

Offense Description

This criminal complaint is based on these facts:

☐ Continued on the attached sheet.

Complainant's signature

Printed name and title

Sworn to before me and signed in my presence.

Date: _____

Judge's signature

City and state: _____

Printed name and title

ATTACHMENT A

Subsequent to June 8, 2022, the Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF) analyzed Firearm Transaction Records (ATF Form 4473s) from various Federal Firearm Licensees (FFLs) in Laredo, Texas, and noticed that a female identified as Ingrid Nayeli MUNOZ purchased multiple AK-47 type and AR-15 type rifles.

ATF also noticed that the type of rifles MUNOZ purchased are commonly trafficked to Mexico and are weapons of choice used by the Mexican drug cartels. The firearms MUNOZ purchased at three different FFLs in Laredo, Texas, and date of purchase are listed below:

FFL #1.

- I. **MAKE:** Century Arms, **MODEL:** VSKA, **CALIBER:** 7.62x39 millimeter rifle, bearing serial number SV7093197. **PURCHASE DATE:** *October 21, 2021.*

FFL #2.

- II. **MAKE:** Radical Firearms LLC, **MODEL:** RF-15, **CALIBER:** 5.56 NATO rifle, bearing serial number UT-02047. **PURCHASE DATE:** *October 27, 2021.*
- III. **MAKE:** Unbranded AR, **MODEL:** UAR-C, **CALIBER:** .223 Wylde rifle, bearing serial number UT-02047. **PURCHASE DATE:** *October 27, 2021.*
- IV. **MAKE:** Century Arms, **MODEL:** VSKA, **CALIBER:** 7.62x39 millimeter rifle, bearing serial number SV7107463. **PURCHASE DATE:** *May 24, 2022.*

FFL #3.

- V. **MAKE:** Sig Sauer, **MODEL:** M400, **CALIBER:** 5.56 NATO rifle, bearing serial number 20L185118. **PURCHASE DATE:** *June 8, 2022.*
- VI. **MAKE:** Israel Weapon Industries- IWI, **MODEL:** Z15, **CALIBER:** 5.56-millimeter rifle, bearing serial number Z0010739. **PURCHASE DATE:** *June 8, 2022.*

On January 3, 2023, ATF received information from the Government of Mexico, that Coahuila State Ministerial Police responded to a residence in Castanos, Coahuila, Mexico, for a homicide investigation, and recovered the **Israel Weapon- IWI, model Z15, 5.56-millimeter rifle, bearing serial number Z0010739** (purchased by MUNOZ).

On January 11, 2023, ATF agents interviewed Ingrid Nayeli MUNOZ at the Laredo Port of Entry Bridge #1, "Gateway to the Americas." After advisement of rights and waiver, MUNOZ told agents that she purchased each of the rifles, listed above, on behalf of another individual (hereinafter FNU LNU). MUNOZ informed agents that she believes FNU LNU cannot purchase firearms because FNU LNU is either a convicted felon or an undocumented alien.

MUNOZ told agents that she would receive cash from FNU LNU to purchase the firearms. MUNOZ also stated that FNU LNU paid her \$1,500.00 cash each time she purchased the firearm(s) at the FFLs for FNU LNU.

ATF showed MUNOZ the ATF Form 4473's she filled out when she purchased each firearm(s) at the FFLs. MUNOZ stated that she understood the ATF Form 4473 and acknowledged that her signature was on each form. MUNOZ provided a false statement in connection with the purchase of the firearm(s) when she answered "Yes" to being the actual buyer on the ATF Form 4473's. MUNOZ told agents that she should have answered "No" to being that actual buyer of the firearm(s) on the ATF Form 4473's.